

ORIGINAL

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DISH NETWORK LLC, NAGRASTAR
LLC,

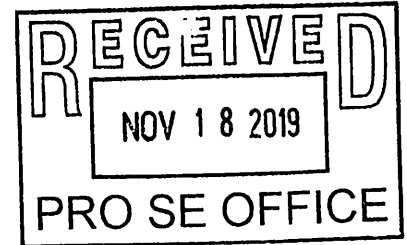
Plaintiffs,

19 cv 5539 (MKB) (VMS)

v.

ROY JAMES,

Defendant.



ANSWER BY PRO SE DEFENDANT ROY JAMES¹

Pro se defendant Roy James² hereby answers the allegations in the above-captioned
Complaint as follows:

1. Lack information or belief sufficient to affirm or deny the allegations in paragraph 1.
2. Lack information or belief sufficient to affirm or deny the allegations in paragraph 1.
3. Admit.
4. Legal conclusion to which no response is required. To the extent a response is required, deny the allegations in paragraph 4.
5. Lack information or belief sufficient to affirm or deny the allegations in paragraph 5.

¹ Defendant is misidentified in the caption as "James Roy." He requests that the Clerk's Office correct the caption to reflect the correct order of his name, "Roy James."

² A draft of this pleading was prepared with the help of an attorney in the City Bar Justice Center's Pro Se Legal Assistance Project.

6. Legal conclusion to which no response is required. To the extent a response is required, deny the allegations in paragraph 6.
7. Deny the allegations in paragraph 7.
8. Lack information or belief sufficient to affirm or deny the allegations in paragraph 8.
9. Lack information or belief sufficient to affirm or deny the allegations in paragraph 9.
10. Lack information or belief sufficient to affirm or deny the allegations in paragraph 10.
11. Lack information or belief sufficient to affirm or deny the allegations in paragraph 11.
12. Lack information or belief sufficient to affirm or deny the allegations in paragraph 12.
13. Lack information or belief sufficient to affirm or deny the allegations in paragraph 13.
14. Lack information or belief sufficient to affirm or deny the allegations in paragraph 14.
15. Lack information or belief sufficient to affirm or deny the allegations in paragraph 15.
16. Lack information or belief sufficient to affirm or deny the allegations in paragraph 16.
17. Lack information or belief sufficient to affirm or deny the allegations in paragraph 17.

18. Lack information or belief sufficient to affirm or deny the allegations in paragraph

18.

19. Lack information or belief sufficient to affirm or deny the allegations in paragraph

19.

20. Lack information or belief sufficient to affirm or deny the allegations in paragraph

20.

21. Lack information or belief sufficient to affirm or deny the allegations in paragraph

21.

22. Deny the allegations in paragraph 22.

23. Deny the allegations in paragraph 23.

24. Deny the allegations in paragraph 24.

25. Defendant repeats his responses to the allegations as above.

26. Deny the allegations in paragraph 26.

27. Lack information or belief sufficient to affirm or deny the allegations in paragraph

27 related to Plaintiffs' security system; otherwise deny the allegations in

paragraph 27, including deny that Defendant engaged in any wrongful behavior.

28. Lack information or belief sufficient to affirm or deny the allegations in paragraph

28 related to Plaintiffs' security system; otherwise deny the allegations in

paragraph 28, including that Defendant engaged in any wrongful behavior.

29. Deny the allegations in paragraph 29.

30. Deny the allegations in paragraph 30.

31. Defendant repeats his responses to the allegations as above.

32. Deny the allegations in paragraph 32.

33. Lack information or belief sufficient to affirm or deny the allegations in paragraph 33 regarding the passcodes; otherwise deny the allegations in paragraph 33, including that Defendant engaged in any wrongful behavior.

34. Deny the allegations in paragraph 34.

35. Deny the allegations in paragraph 35.

36. Defendant repeats his responses as above.

37. Deny the allegations in paragraph 37.

38. Lack information or belief sufficient to affirm or deny the allegations in paragraph 38 regarding Plaintiffs' security system; otherwise deny the allegations in paragraph 38, including that Defendant engaged in any wrongful behavior.

39. Deny the allegations in paragraph 39.

40. Deny the allegations in paragraph 40.

41. Defendant repeats his responses to the allegations above.

42. Deny the allegations in paragraph 42.

43. Deny the allegations in paragraph 43.

44. Deny the allegations in paragraph 44.

45. Defendant repeats his responses to the allegations above.

46. Deny the allegations in paragraph 46.

47. Deny the allegations in paragraph 47.

48. Deny the allegations in paragraph 48.

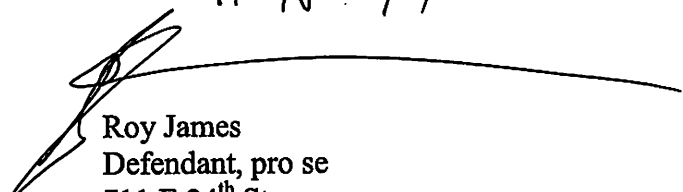
First Affirmative Defense

Plaintiffs fail to state a claim to legal relief under Federal Rule of Civil Procedure 12(b)(6).

Second Affirmative Defense

Some or all of Plaintiffs' claims are barred by the applicable statutes of limitations.

Dated: 11-18-19



Roy James
Defendant, pro se
711 E 24th St.
Brooklyn, NY 11210
(347) 247-9345

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AFFIRMATION OF SERVICE

I, Roy James, declare under penalty of perjury that I have served a copy of the foregoing Answer by Pro Se Defendant upon Robert Richard Jones, attorney for Plaintiff, whose address is Coughlin & Gerhart LLP, P.O. Box 2039, Binghamton, NY 13902, by the following method:

Check one

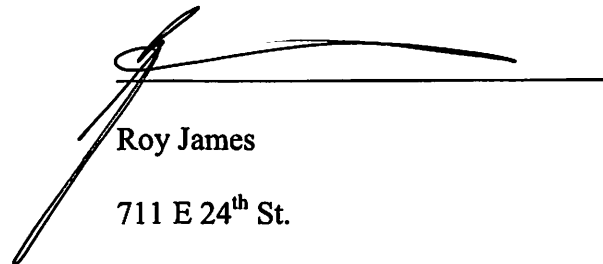
☒ US Mail.

☐ Hand delivery.

☐ Fed Ex, UPS, or other private carrier.

Dated: 11-18-19

Brooklyn, NY



Roy James

711 E 24th St.

Brooklyn, NY 11210

(347) 247-9345

